

UNITED STATES DISTRICT COURT  
OF THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

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**MARJORIE TAYLOR GREENE**, an individual,

*Plaintiff,*

*v.*

**MR. BRAD RAFFENSPERGER**, in his official capacity as Georgia Secretary of State, **MR. CHARLES R. BEAUDROT**, in his official capacity as an Administrative Law Judge for the Office of State Administrative Hearings for the State of Georgia, **JOHN DOE 1**, in his official capacity, and **GOVERNMENT ENTITY 1**,

*Defendants.*

**Civ. No. 1:22-cv-01294-AT**

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**Stipulation of Facts**

The parties, by and through undersigned counsel, stipulate to the following facts the purposes of the evidentiary hearing on April 8, 2022:

1. Rep. Greene currently serves as a Member of the U.S. House of Representatives, for Georgia's 14th Congressional District.

**Pl.'s and Defs.'**  
**Stipulation of Facts**

2. Rep. Greene filed her candidacy, for the upcoming midterm elections, for Georgia's 14th Congressional District, on March 7, 2022, and filed an amended notice of candidacy on March 10, 2022.
3. On March 24, 2022, several Challengers filed a Challenge against Rep. Greene with the Georgia Secretary of State.
4. The same day, the Secretary of State's office sent notice of the Challenge to Rep. Greene to the email address and mailing address provided by Rep. Greene in her corrected qualifying forms.
5. The Greene Challenge was based upon claims that Rep. Greene "aided and engaged in an insurrection to obstruct the peaceful transfer of presidential power, disqualifying her from serving as a Member of Congress under Section 3 of the 14th Amendment and rendering her ineligible under state and federal law to be a candidate for such office."
6. The Greene Challenge was lodged with the Georgia Secretary of State, who referred it to the Office of State Administrative Hearings ("OSAH"). OSAH assigned ALJ Beaudrot to hear the challenge.
7. The Challengers filed a notice to produce documents and a motion to take Rep. Greene's deposition with the OSAH.

**Pl.'s and Defs.'  
Stipulation of Facts**

8. On March 30, 2022, ALJ Beaudrot ordered Rep. Greene to respond to Petitioner's motions by noon on April 4, 2022.
9. On April 3, 2022, Rep. Greene filed a motion to dismiss the OSAH challenge; a motion to stay the Rep. Greene's deposition; and objections to the Challengers' notice to produce documents.
10. On April 4, 2022, ALJ Beaudrot denied the Challengers' motion to take Rep. Greene's deposition.
11. On April 5, 2022, ALJ Beaudrot held a prehearing conference call during which, among other things, he ordered the challengers to respond to Rep. Greene's objections to the notice to produce by 5:00 p.m. on Thursday, April 7, and ordered the Challengers to respond to Rep. Greene's motion to dismiss by 11:00 a.m. on Monday, April 11. ALJ Beaudrot has not yet ruled on Rep. Greene's objections.
12. A hearing before ALJ Beaudrot has been scheduled for April 13, 2022.

Dated: April 8, 2022

Respectfully submitted,

/s/ Kurt R. Hilbert

Kurt Hilbert, GA Bar No. 352877

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**Stipulation of Facts**

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**Pl.'s and Defs.'**  
**Stipulation of Facts**

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**Stipulation of Facts**

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*Attorney for the Rowan Intervenors*

- *Admission pro hac vice pending*

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## **Certificate of Compliance**

The undersigned counsel certifies that the foregoing has been prepared in Times New Roman (14 point) font, as required by the Court in Local Rule 5.1(B). Respectfully submitted on April 8, 2022.

/s/ James Bopp, Jr.  
Attorney for Plaintiff

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**Stipulation of Facts**

## **Certificate of Service**

I hereby certify that on April 8, 2022, a copy of the foregoing document was filed using the Court's CM/ECF system. Counsel for all parties and Proposed-Intervenors were noticed of this filing through this system.

/s/ James Bopp, Jr.  
Attorney for Plaintiff

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